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Richland Operations Office  
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0065900

05-AMCP-0356

JUL 25 2005

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Office of Environmental Cleanup  
Hanford Project Office  
U.S. Environmental Protection Agency  
309 Bradley Blvd., Suite 115  
Richland, Washington 99352

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

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AUG 01 2005

EDMC

Addressees:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (AGREEMENT)  
CHANGE PACKAGES M-15-05-02, PAUSE M-015 INTERIM MILESTONES AND  
M-20-05-01, PAUSE AGREEMENT INTERIM MILESTONES M-020-39 AND M-020-33

As a follow-on to our May 24, 2005, meeting, the U.S. Department of Energy, the U.S. Environmental Protection Agency and the State of Washington Department of Ecology, hereinafter referred to as the Parties, agreed to pause selected M-015 and M-020 interim milestones so that resources can be focused on the development of the outline and path forward for a modified approach for completion of the Remedial Investigation/Feasibility Study (RI/FS) process for Central Plateau waste sites. This modified approach addresses issues and lessons learned that have arisen through the processing of early RI/FS documents for decision making.

The enclosed Agreement Change Requests, M-15-05-02 and M-20-05-01 formalize the 120-day pause. In addition, there are two M-020 series milestones (referenced above) that support M-015 milestones: Agreement Interim Milestone M-020-33, Submit 216-A-10 Crib, 216-A-36B Crib, 216-A-37-1 Crib, and 207-A South Retention Basin Closure/Post Closure Plans to Ecology in Coordination with the Feasibility Study for the 200-PW-2 Uranium-Rich Process Waste Group Operable Unit (to be coordinated under M-015-43C), due December 31, 2005; and, M-020-39, Submit 216-S-10 Pond and Ditch Closure/Post Closure Plan to Ecology in Coordination with the

Addressees  
05-AMCP-0356

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JUL 25 2005

Feasibility Study for the 200-CS-1 Chemical Sewer Group Operable Unit (to be Coordinated Under M-015-39C), due November 30, 2005. A separate Agreement Change Request, M-20-05-01 is enclosed to document the pause related to the two M-020 interim milestones.

In accordance with Agreement Action Plan, Section 12.0, Changes to the Agreement, the Parties have 14 days following receipt of a signed change package to act on it.

If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



*for* Keith A. Klein  
Manager

AMCP:MJV

Enclosures

cc w/encls:

B. A. Austin, FHI

D. Bartus, EPA

G. Bohnee, NPT

L. D. Crass, FHI

L. J. Cusack, Ecology

L. J. Fritz, FHI

S. Harris, CTUIR

J. S. Hertzell, FHI

R. Jim, YN

T. Martin, HAB

E. J. Murphy-Fitch, FHI

K. Niles, ODOE

Administrative Record (H6-08)

<b>Change Number</b> M-15-05-02	<b>Federal Facility Agreement and Consent Order Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> July 20, 2005
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<b>Originator</b> L. D. Romine, RL/J. D. Voice, U.S Department of Energy	<b>Phone</b> 509-376-4747/ 509-376-8523
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<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager
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<b>Change Title</b> Delay Hanford Federal Facility Agreement and Consent Order (Agreement) M-015 Interim Milestones.
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**Description/Justification of Change**  
This change request follows on from Inter-Agency discussions between the U.S. Department of Energy, the State of Washington Department of Ecology and the U.S. Environmental Protection Agency (Parties). The Parties have agreed to delay five M-015 Agreement Milestones for 120 days. The five milestones to be delayed are M-015-39C, M-015-43C, M-015-44A, M-15-45A and M-015-46A. This delay will allow resources to be focused on development of an outline/path forward addressing scope and schedule to support a modified approach for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) decisions that address current issues and concerns within the decision making process. The path forward will identify decision models for waste sites, characterization needs based on the decision models, gaps within the current data, and recommend appropriate milestones in support of the M-015 series of milestones.

Within milestone series M-015, the remaining two Major Milestones, M-015-00 and M-015-00C and five Agreement Interim Milestones M-015-48A, M-015-48B, M-015-44B, M-015-45B, and M-015-46B are not modified by this change package and remain unchanged.

Specific Changes to the M-015 series milestones are shown on page 2 of this Tri-Party Agreement change request.

At the June 28, 2005, Tri-Party Agency Executive Committee meeting, the Parties acknowledged that the work supporting Tri-Party Agreement Interim Milestones M-015-44B, M-015-45B, and M-015-46B would be impacted by the delay and results of the new path forward. It was agreed that the Executive Committee would review these impacts and evaluate any related milestone changes at the end of a 120 day period, which starts with final approval of this change form.

**Impact of Change**  
This extends the completion date for five M-015 series milestones. Impacts to M-020 Series Milestones associated with modifications to Agreement Interim Milestones M-015-39C and M-015-43C are addressed by change form M-20-05-01 in conjunction with this Agreement change package.

**Affected Documents**  
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Site Wide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).

<b>Approvals</b>			Page 1 of 2	
DOE	 K. Klein	7/25/05 Date		<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA	N. Ceto	_____ Date		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology	M. Wilson	_____ Date		<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

**Listing of M-015 Series Milestones and Completion Dates**

Two Agreement Major Milestones (M-015-00 and M-015-00C) and five Interim Tri-Party Agreement Milestones (M-015-48A, M-015-48B, M-015-44B, M-015-45B, and M-015-46B) are unchanged by this action.

Impacts to M-020 Series Milestones associated with these changes to Agreement Interim Milestones M-015-39C and M-015-43C are addressed by Agreement change form M-20-05-01.

Modifications to existing Tri-Party Agreement milestones are denoted using ~~strikeout~~ for text deletions and **shading** for text additions.

<b>Number</b>	<b>Title</b>	<b>Due Date</b>
M-015-00	Complete the remedial investigation/Feasibility Study (RI/FS) or (RFI/CMS) process for all operable units.	12/31/2008
M-015-00C	Complete all 200 Area non-tank farm operable unit pre-rod site investigations under approved work plan schedules.	12/31/2008
M-015-39C	Submit Draft A 200-CS-1 Chemical Sewer Group FS and submit Draft A 200-CS-1 Chemical Sewer Group Proposed Plan/proposed Resource Conservation and Recovery Act Permit Modification.	<del>11/30/2005</del> <b>03/31/2006</b>
M-015-43C	Submit 200-PW-2 OU Feasibility Study and Proposed Plan/proposed Resource Conservation and Recovery Act Permit Modification including the past practice waste sites in the 200-PW-4 general process waste group.	<del>12/31/2005</del> <b>04/30/2006</b>
M-015-44A	Submit 200-MW-1 OU Remedial Investigation Report.	<del>12/31/2005</del> <b>04/30/2006</b>
M-015-44B	Submit 200-MW-1 OU Feasibility Study And Proposed Plan.	12/31/2006
M-015-45A	Submit Plutonium/Organic-Rich OU Remedial Investigation Report including the past practice waste sites in the 200-PW-1 OU Plutonium/Organic-Rich Process Condensate/Process Waste Group OU, 200-PW-3 Organic-Rich Process Condensate/Process Waste Group OU, and 200-PW-6 Plutonium-Rich Process Condensate/Process Waste Group OU.	<del>6/30/2006</del> <b>10/31/2006</b>
M-015-45B	Submit Plutonium/Organic-Rich OU Feasibility Study and Proposed Plan including the past practice waste sites in the 200-PW-1 OU Plutonium/Organic-Rich Process Condensate/Process Waste Group OU, 200-PW-3 Organic-Rich Process Condensate/Process Waste Group OU, and 200-PW-6 Plutonium-Rich Process Condensate/Process Waste Group OU.	9/30/2007
M-015-46A	Submit 200 Area Chemical Laboratory Waste OUs Remedial Investigation Report, including the past practice waste sites in the 200-LW-1 and 200-LW-2 200 Area Chemical Laboratory Groups.	<del>10/31/2005</del> <b>02/28/2006</b>
M-015-46B	Submit 200 Area Chemical Laboratory Waste OUs Feasibility Study and Proposed Plan/Proposed Permit Modification, including the past practice waste sites in the 200-LW-1 and 200-LW-2 200 Area Chemical Laboratory Groups.	9/30/2006
M-015-48A	Submit Draft A 200-ZP-1 CERCLA Remedial Investigation Report to EPA.	5/31/2006
M-015-48B	Submit Draft A 200-ZP-1 CERCLA Feasibility Study/Proposed Plan to EPA.	05/31/2007



**Change Number**

M-20-05-01

**Federal Facility Agreement and Consent Order**

**Change Control Form**

Do not use blue ink. Type or print using black ink.

**Date**

July 20, 2005

**Originator**

L. D. Romine /J. D. Voice, U.S. Department of Energy

**Phone**

509-376-4747/509-376-8523

**Class of Change**

[ ] I - Signatories

[X] II - Executive Manager

[ ] III - Project Manager

**Change Title**

Delay Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestones M-020-33 and M-020-39 in conjunction with Agreement Change Request M-15-05-02.

**Description/Justification of Change**

This change request follows on from Inter-Agency discussions between the U. S. Department of Energy, the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (Parties). The Parties have agreed to delay five M-015 Series Agreement interim milestones for 120 days so that resources can be focused on the development of an outline/path forward addressing scope and schedule to support a modified approach for Comprehensive Environmental Response, Compensation and Liability Act decisions that address current issues and concerns within the decision making process. The path forward will identify decision models for waste sites, characterization needs based on the decision models, gaps within the current data, and recommend appropriate milestones in support of Agreement Series M-015.

Current Agreement Milestone Series M-020 includes two near term interim milestones, M-020-33 and M-020-39, which are intricately coordinated with Milestone Series M-015. Tri-Party Agency Executive Committee discussions, held on June 28, 2005, addressed the need to adjust these two M-020 interim milestone due dates in order to align the M-020 and M-015 work and maintain this coordinated approach. See page two of this change request for specific modifications made by this change request to the M-020-33 and M-020-39 interim milestones.

**Impact of Change**

This Agreement Change Request extends the completion date for Interim Milestones M-020-33 and M-020-39 to maintain the coordinated approach and aligns them with the changes to M-015 milestones in accordance with Agreement Change Request M-15-05-02.

**Affected Documents**

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Site Wide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).

**Approvals**

	<u>7/20/05</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE K. Klein	Date		
<u>N/A</u>	<u></u>	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
EPA N. Ceto	Date		
<u></u>	<u></u>	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
Ecology M. Wilson	Date		



**Listing of Agreement M-020 Series Milestones**

Modifications to Agreement Interim Milestones M-020-33 and M-020-39 are denoted using ~~strikeout~~ for text deletions and **shading** for text additions.

Note: Agreement Milestones M-020-00, M-020-00B and M-020-54 are not modified by this change request.

Milestone	Description	Due Date
M-020-00 LEAD AGENCY: ECOLOGY	<p>Submit Part B Permit Applications or closure/post-closure plans for all Resource Conservation and Recovery Act treatment, storage and disposal (TSD) units except 303-M Oxide Facility and 1706-KE Waste Treatment System. Permit applications, closure, and post-closure plans will be submitted to Ecology for approval. Individual unit submittals (enforceable as interim milestones) will occur as shown in Appendix D.</p> <p>Pre-closure work plans will be prepared and submitted for approval for TSD Units which will achieve closure in conjunction with the disposition of the facility in which they are contained.</p> <p>Compliance with the work schedules set forth in this M-20 series is defined as the performance of sufficient work to assure with reasonable certainty that DOE will accomplish series M-20 major and interim milestone requirements.</p> <p>DOE internal work schedules (e.g., DOE approved schedule baselines) and associated work directives and authorizations shall be consistent with the requirements of this Tri-Party Agreement. Modification of DOE contractor baseline(s) and issuance of associated DOE work directives and/or authorizations that are not consistent with Agreement requirements shall not be finalized prior to approval of an Agreement change request submitted pursuant to Agreement Action Plan Section 12.0.</p>	12/31/2008
M-020-00B	Submit closure/post-closure plans for 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72. The 303-M Oxide Facility closure/post closure, per approved Change Form M-20-92-05, is covered separately under M-94-01 and the 1706-KE Waste Treatment System closure/post closure is covered separately under M-16-52.	12/31/2008
M-020-33	Submit 216-A-10 Crib, 216-A-36B Crib, 216-A-37-1 Crib, and 207-A South Retention Basin closure/post closure plans to Ecology in coordination with the feasibility study for the 200-PW-2 Uranium-Rich Process Waste Group Operable Unit (to be coordinated under M-15-43C).	<del>12/31/2005</del> 04/30/2006
M-020-39	Submit 216-S-10 Pond and Ditch closure/postclosure plan to Ecology in coordination with the feasibility study for the 200-CS-1 Chemical Sewer Group Operable Unit (to be coordinated under M-15-39C).	<del>11/30/2005</del> 03/31/2006
M-020-54	Submit 241-CX-70 Storage Tank, 241-CX-71 Neutralization Tank, 241-CX-72 Storage Tank closure/post closure plan to Ecology in coordination with the 200-IS-1 Tanks/Lines/Pits/Boxes Operable Unit work plan feasibility study scheduled under M-13-00M.	12/31/2008

